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June 4, 2012

By Federal Express, Facsimile and CM/ECF

The Honorable Karen M. Williams
United States Magistrate Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

**RE: *Michaelson v. Golden Gate Private Equity, Inc. et al.*, Civ. No. 11-807
(JEI/KM) (D. Del.)**

Dear Judge Williams:

My firm is co-counsel for Robert N. Michaelson, Trustee of the Appleseed's Litigation Trust and Plaintiff in the above-referenced proceeding. As you are aware, on June 1, 2012 [D.I. 68], a proposed form of scheduling order agreed to by all parties in the case was filed on the Court's docket. The parties request that the Court enter the proposed form of scheduling order in its current form at the Court's convenience.

In addition to reaching an agreement on the terms of a scheduling order, Plaintiff and the Golden Gate defendants have agreed to a mediation of all claims and causes of action and towards this end, former judge, Daniel Weinstein is scheduled to conduct the mediation on June 26 and 27. Accordingly, the parties request that the Court adjourn the scheduling conference presently scheduled for June 7, 2012 and reschedule, if necessary, at the Court's convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Howard A. Cohen'.

Howard A. Cohen (DE 4082)

VIA ELECTRONIC MAIL ONLY

cc.: Robert N. Michaelson; Jay Indyke
Robert Moore; Linda Dakin-Gramm
Sander Bak; Michael Klein
The Honorable Joseph E. Irenas
All counsel of record in the District Court Action

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